

RETURN DATE: APRIL 2, 2019	:	SUPERIOR COURT
JOELYS RODRIGUEZ, ET AL	:	J.D. OF NEW HAVEN
V.	:	AT NEW HAVEN
MARTEZZ BANKS, ET AL	:	FEBRUARY 22, 2019

COMPLAINT

COUNT ONE: (Joelys Rodriguez v. Martezz T. Banks as to Negligence)

1. At all times relevant herein, the plaintiff, Joelys Rodriguez was a resident of New Haven, Connecticut.
2. At all times relevant herein, the defendant Martezz T. Banks was a resident of New Haven, Connecticut.
3. On or about March 3, 2017 at approximately 7:30 a.m. the defendant, Martezz Banks was the operator of a 1998 Ford F-150, registration number C105657.
4. At all times relevant herein, the defendant, Shirley A. Banks was the registered owner of the afore mentioned 1998 Ford F-150.
5. At all times relevant herein, the defendant, Martezz Banks was the servant, agent or employee of the defendant, Shirley Banks, and acting within the scope of his authority or employment.
6. At all times relevant herein, the vehicle being operated by the defendant, Martezz Banks, was done so with the general authority of the owner Shirley banks.
7. At all times relevant herein, said vehicle was being operated by the defendant, Martezz Banks as a family car with the general authority of the owner.
8. At said time the defendant, Martezz Banks was traveling along Interstate 91 North in New Haven, Connecticut.

9. At said time the defendant, Martezz Banks was being pursued by the East Have Police Department.
10. At said time the defendant Martezz Banks, exited Interstate 91 North using exit 5.
11. At said time and place, the plaintiff, Joelys Rodriguez, was stopped at a red light on the exit 5 ramp.
12. At said time and place, the defendant, Martezz Banks suddenly and without warning collided with the vehicle being operated by Joelys Rodriguez.
13. Said collision was caused by the carelessness and negligence of the defendant, Martezz Banks in one or more of the following ways:
 - a. In that he was following too closely behind the plaintiff's vehicle in violation of C.G.S. Section 14-240;
 - b. In that he was operating his vehicle at an excessive rate of speed, given all the weather, traffic and road conditions then and there existing in violation of C.G.S. Section 14-218a;
 - c. In that he failed to keep a proper lookout;
 - d. In that he was traveling unreasonably fast;
 - e. In that he failed to keep his vehicle under reasonable and proper control;
 - f. In that he failed to apply his brakes in a timely manner;
 - g. In that he failed to swerve so as to avoid colliding with the rear of the plaintiff's vehicle even though he reasonably could and should have done so; and
 - h. In that failed to apply his brakes in a timely manner.

14. As a direct and proximate result of the defendant's negligence and the afore mentioned collision, the plaintiff, Joelys Rodriguez suffered serious personal injuries including but not limited to the following:
- a. cervical injuries
 - b. thoracic injuries
 - c. lumbar injuries
 - d. left knee injury
 - e. left shoulder injury
 - f. right shoulder injury
 - g. mental suffering and anguish
15. As result of the aforesaid injuries, the plaintiff has incurred substantial medical expenses for her treatment of said injuries.
16. As a further result of the defendant's negligence, the plaintiff has been permanently disabled, and will be prevented from fully participating in all of life's activities as she had enjoyed them prior to the collision.
17. As result of the aforesaid injuries, the plaintiff has lost substantial income and wages.
18. As a further result of the defendant's negligence, the plaintiff will likely require future medical treatment, including additional surgery, and will likely incur significant future medical expenses.

COUNT TWO: **(Joelys Rodriguez v. East Haven Police Department as to Negligence)**

1. At all times relevant herein, the defendant, City of East Haven, was a municipal corporation organized and existing under the laws of the State of Connecticut, and the defendant City of East Haven, operated, controlled and supervised the East Haven Police Department.
2. At all times relevant herein, the Chief of Police for the East Haven Police Department and was charged under Section 14-283a of the Connecticut General Statutes with the responsibility of assuring that the City of East Haven officers understood the Uniform Statewide Pursuit Policy, 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies and East Haven Police Department Policies and Procedures governing police pursuits, No. 414.4.
3. At all times relevant herein, the East Haven Police officers (“defendants”) involved in the pursuit of Martezz T. Banks on March 3, 2017 were duly appointed and sworn officers of the East Haven Police Department.
4. At all times relevant herein, the police officers pursuing Martezz T. Banks, were acting within the scope of their employment with the City of East Haven and its police department.
5. On or about March 3, 2017 at approximately 7:34 a.m., Martezz T. Banks was operating a red Ford F-150 bearing registration number C105657.
6. The defendants engaged the F-150 operated by Martezz Banks, in a high-speed pursuit as part of their official duties as officers of the East Haven Police Department.

7. The defendants pursued the Ford F-150 at a high rate of speed along Interstate 91 North, outside of their jurisdiction through the City of New Haven, Connecticut.
8. At all times relevant herein, Interstate 91 was a public highway located in the State of Connecticut.
9. As a consequence of the high-speed police pursuit by the defendants, and their following of said vehicle in a northerly direction on Interstate 91 in excess of the posted speed limit, the vehicle being operated by Martezz Banks was traveling at a high rate of speed onto the exit 5 ramp.
10. At said time and place, the plaintiff Joelys Rodriguez was stopped at a red light on the exit 5 ramp of Interstate 91 North.
11. As a further consequence of the high-speed pursuit and following of said vehicle at speeds in excess of the posted speed limit on I-91 North, the Banks vehicle lost control and violently collided with the vehicle being operated by the plaintiff, Joelys Rodriguez causing the Rodriguez vehicle to violently collide with the vehicle being operated by Ronald F. Daddio.
12. At all times relevant herein, the defendants continued to pursue the Banks vehicle despite the dangerously high speed which the police pursuit had reached and the hazard such pursuit posed to the safety of the public at large.
13. At all times relevant herein, the defendants, engaged in the aforesaid high-speed police pursuit improperly and in violation of Sections 14-283a-1 and 14-283a-4 of the Regulations of Connecticut State Agencies and East Haven Police Department Policies and Procedures No. 414.4.

14. At all times relevant herein, the defendants knew that Martezz Banks, was not considered a danger.
15. The collision between the Banks vehicle and the Rodriguez vehicle and the resulting injuries and damages to Joelys Rodriguez, were caused by the negligence of the defendants in one or more of the following ways:
 - a. In that the defendants initiated a high speed pursuit of the Banks vehicle for an alleged infraction of violation of General Statutes in violation of Connecticut Uniform Statewide Pursuit Policy, Section 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies, and East Haven Police Department Policies and Procedures No. 414.4, when they knew or should have known in the exercise of reasonable care that it was dangerous to do so;
 - b. In that the defendants failed to consider and follow the procedures set forth in the Connecticut Uniform Statewide Pursuit Policy, Section 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies, and East Haven Police Department Policies and Procedures No. 414.4 in determining whether to initiate a high-speed pursuit of the Banks vehicle;
 - c. In that the defendants, failed to initiate and conduct the pursuit in conformity with the Connecticut Uniform Statewide Pursuit Policy, Sections 14-283a-1 to 14-283a-4 of the Regulations of the Connecticut State Agencies, and the East Haven Police Department Policies and Procedures No. 414.4;
 - d. In that the defendants pursued the Banks vehicle at a rate of speed in excess of the posted speed limits on Interstate 91 thereby endangering the life of persons

in the vicinity including Joselyn Rodriguez, in violation of General Statute Section 14-283;

- e. In that the defendants operated their vehicle without due regard for the safety of persons in the vicinity, in violation of General Statute Section 14-283 and the Connecticut Uniform Statewide Pursuit Policy, Section 14-283a-1 to 14-283a-4 of the Regulations of the Connecticut State Agencies, and East Haven Police Department Policies and Procedures No. 414.4.
 - f. In that the defendants, followed the Banks vehicle at speeds in excess of the posted speed limit on Interstate 91 in violation of General Statute Section 14-218a;
 - g. In that the defendants operated their vehicle at unreasonable and excessive rates of speed given the road and traffic conditions then and there existing thereby posing a threat of imminent injury to Joselyn Rodriguez, in violation of Connecticut Uniform Statewide Pursuit Policy Sections 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies and East Haven Police Department Policies and Procedures No. 414.4.
16. As a direct and proximate result of the defendants' negligence and the aforementioned collision, the plaintiff, Joelys Rodriguez suffered serious personal injuries including but not limited to the following:
- a. cervical injuries
 - b. thoracic injuries
 - c. lumbar injuries
 - d. left knee injury

- e. left shoulder injury
- f. right shoulder injury
- g. mental suffering and anguish

17. As result of the aforesaid injuries, the plaintiff has incurred substantial medical expenses for her treatment of said injuries.
18. As result of the aforesaid injuries, the plaintiff has lost substantial income and wages.
19. As a result of the aforesaid injuries, the plaintiff has suffered permanent injuries that prevent her from enjoying life in the same manner as she did prior to the collision.
20. As a further result of the defendant's negligence, the plaintiff will likely require future medical treatment, including additional surgery, and will likely incur significant future medical expenses.

COUNT THREE: (Joelys Rodriguez vs. City of East Haven Pursuant to C.G.S. 52-557n)

1. - 20. Paragraphs 1 through 20 of the Second Count are incorporated and made paragraphs 1 through 20 of this Third Count as if fully set forth herein.
21. The Defendant, City of East Haven, is liable for damages sustained by the plaintiff, Joselyn Rodriguez pursuant to C.G.S. Section 52-557n(a)(1)(A) for the negligent acts or omissions of it's agents and/or employees who were acting within the scope of their employment or official duties.

COUNT FOUR: (Joelys Rodriguez v. City of East Haven Pursuant to C.G.S. 7-465)

1. - 20. Paragraphs 1 through 20 of the Second Count are incorporated and made paragraphs 1 through 20 of this Fourth Count as if fully set forth herein.

21. The defendant, City of East Haven, is liable to pay all sums which it's agents, servants, and/or employees may be obligated to pay by reason of the liability imposed upon them for damages to the plaintiff, Joselyn Rodriguez, pursuant to the provisions of C.G.S. Section 7-465.
22. Written notice of the intent to file this claim was given to the Clerk of the City of East Haven on March 30, 2017. A copy of the written notice is attached hereto as Exhibit A.

COUNT FIVE: (Janelys Camacho v. Martezz T. Banks as to Negligence)

1. The minor plaintiff, Janelys Camacho, brings this action by and through her mother and next friend, Joelys Rodriguez.
2. On or about March 3, 2017 at approximately 7:34 a.m., the plaintiff, Janelys Camacho was a passenger in the vehicle being operated by Joelys Rodriguez.
3. At all times relevant herein, the plaintiff, Janelys Camacho was a resident of New Haven, Connecticut.
4. At all times relevant herein, the defendant Martezz T. Banks was a resident of New Haven, Connecticut.
5. On or about March 3, 2017 at approximately 7:30 a.m. the defendant, Martezz Banks was the operator of a 1998 Ford F-150, registration number C105657.
6. At all times relevant herein, the defendant, Shirley A. Banks was the registered owner of the afore mentioned 1998 Ford F-150.
7. At all times relevant herein, the defendant, Martezz Banks was the servant, agent or employee of the defendant, Shirley Banks, and acting within the scope of his authority or employment.

8. At all times relevant herein, the vehicle being operated by the defendant, Martezz Banks, was done so with the general authority of the owner Shirley banks.
9. At all times relevant herein, said vehicle was being operated by the defendant, Martezz banks as a family car with the general authority of the owner.
10. At said time the defendant, Martezz Banks was traveling along Interstate 91 North in New Haven, Connecticut.
11. At said time the defendant, Martezz Banks was being pursued by the East Have Police Department.
12. At said time the defendant Martezz Banks, exited Interstate 91 North using exit 5.
13. At said time and place, plaintiff, Joelys Rodriguez, was stopped at a red light on the exit 5 ramp.
14. At said time and place, the defendant, Martezz Banks suddenly and without warning struck the vehicle being operated by Joelys Rodriguez, which the plaintiff Janelys Camacho was a passenger.
15. Said accident was caused by the carelessness and negligence of the defendant, Martezz Banks in one or more of the following ways:
 - a. In that he was following too closely behind the plaintiff's vehicle in violation of C.G.S. Section 14-240;
 - b. In that he was operating his vehicle at an excessive rate of speed, given all the weather, traffic and road conditions then and there existing in violation of C.G.S. Section 14-218a;
 - c. In that he failed to keep a proper lookout;
 - d. In that he was traveling unreasonably fast;

- e. In that he failed to keep his vehicle under reasonable and proper control;
 - f. In that he failed to apply his brakes in a timely manner;
 - g. In that he failed to swerve so as to avoid colliding with the rear of the plaintiff's vehicle even though he reasonably could and should have done so; and
 - h. In that failed to apply his brakes in a timely manner.
16. As a direct and proximate result of the defendants' negligence and the afore mentioned collision, the plaintiff, Janelys Camacho suffered serious personal injuries including but not limited to the following:
- a. chest contusion
 - b. mental suffering and anguish
17. As result of the aforesaid injuries, the plaintiff has incurred substantial medical expenses for her treatment of said injuries.
18. As a further result of the defendant's negligence, the plaintiff has been prevented from fully participating in all of life's activities as she had enjoyed them prior to the collision.

COUNT SIX: **(Janelys Camacho v. East Haven Police Department, as to Negligence.)**

- 1. The minor plaintiff, Janelys Camacho, brings this action by and through her mother and next friend, Joelys Rodriguez.
- 2. On or about March 3, 2017 at approximately 7:34 a.m., the plaintiff, Janelys Camacho was a passenger in the vehicle being operated by Joelys Rodriguez.
- 3. At all times relevant herein, the defendant, City of East Haven, was a municipal corporation organized and existing under the laws of the State of Connecticut, and

the defendant City of East Haven, operated, controlled and supervised the East Haven Police Department.

4. At all times relevant herein, the Chief of Police for the East Haven Police Department and was charged under Section 14-283a of the Connecticut General Statutes with the responsibility of assuring that the City of East Haven officers understood the Uniform Statewide Pursuit Policy, 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies and East Haven Police Department Regulations governing police pursuits No. 414.4.
5. At all times relevant herein, the East Haven Police officers ("defendants") involved in the pursuit of Martezz T. Banks on March 3, 2017 were duly appointed and sworn officers of the East Haven Police Department.
6. At all times relevant herein, the defendants, were acting within the scope of their employment with the City of East Haven and its police department.
7. On or about March 3, 2017 at approximately 7:34 a.m., Martezz T. Banks was operating a red Ford F-150 bearing registration number C105657.
8. The defendants engaged the F-150 operated by Martezz Banks, in a high-speed pursuit as part of their official duty as officers of the East Haven Police Department.
9. The defendants, pursued the Ford F-150 at a high rate of speed along Interstate 91 North, outside of their jurisdiction through the City of New Haven, Connecticut.
10. As a consequence of the high-speed police pursuit by the defendants, and their following of said vehicle in a northerly direction on Interstate 91 in excess of the posted speed limit, the vehicle being operated by Martezz Banks was traveling at a high rate of speed onto the exit 5 ramp.

11. At said time and place, Joelys Rodriguez's vehicle was stopped at a red light on the exit 5 ramp of Interstate 91 North.
12. As a further consequence of the high-speed pursuit and following of said vehicle at speeds in excess of the posted speed limit on I-91 North, the Banks vehicle lost control and violently collided with the vehicle being operated by the, Joelys Rodriguez causing the Rodriguez vehicle to violently collide with the vehicle being operated by Ronald F. Daddio.
13. At all times relevant herein, the defendants continued to pursue the Banks vehicle despite the dangerously high speed which the police pursuit had reached and the hazard such pursuit posed to the safety of the public at large.
14. At all times relevant herein, the defendants, engaged in the aforesaid high-speed police pursuit improperly and in violation of Sections 14-283a-1 and 14-283a-4 of the Regulations of Connecticut State Agencies and East Haven Police Department Policies and Procedures No. 414.4.
15. At all times relevant herein, the defendants knew that Martez Banks, was not considered a danger.
16. The collision between the Banks vehicle and the Rodriguez vehicle and the resulting injuries and damages to Janelys Camacho, were caused by the negligence of the defendants in one or more of the following ways:
 - a. In that the defendants, initiated a high speed pursuit of the Banks vehicle for an alleged infraction of violation of General Statutes Section 14-96p in violation of Connecticut Uniform Statewide Pursuit Policy, Section 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies, and East Haven Police

Department Policies and Procedures No. 414.4, when they knew or should have known in the exercise of reasonable care that it was dangerous to do so;

- b. In that the defendants failed to consider and follow the procedures set forth in the Connecticut Uniform Statewide Pursuit Policy, Section 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies, and East Haven Police Department Policies and Procedures No. 414.4, in determining whether to initiate a high-speed pursuit of the Banks vehicle;
- c. In that the defendants, failed to initiate and conduct the pursuit in conformity with the Connecticut Uniform Statewide Pursuit Policy, Sections 14-283a-1 to 14-283a-4 of the Regulations of the Connecticut State Agencies, and the East Haven Police Department Policies and Procedures, No. 414.4;
- d. In that the defendants pursued the Banks vehicle at a rate of speed in excess of the posted speed limits on Interstate 91 thereby endangering the life of persons in the vicinity including Joselyn Rodriguez, in violation of General Statute Section 14-283;
- e. In that the defendants, operated their vehicle without due regard for the safety of persons in the vicinity in violation of General Statute Section 14-283 and the Connecticut Uniform Statewide Pursuit Policy, Section 14-283a-1 to 14-283a-4 of the Regulations of the Connecticut State Agencies, and East Haven Police Department Policies and Procedures No. 414.4;
- f. In that the defendants, followed the Banks vehicle at speeds in excess of the posted speed limit on Interstate 91 in violation of General Statute Section 14-218a;

g. In that the defendants, operated their vehicle at unreasonable and excessive rates of speed given the road and traffic conditions then and there existing thereby posing a threat of imminent injury to Joselyn Rodriguez, in violation of Connecticut Uniform Statewide Pursuit Policy Sections 14-283a-1 to 14-283a-4 of the Regulations of Connecticut State Agencies and East Haven Police Department Policies and Procedures No. 414.4.

17. As a direct and proximate result of the defendant's negligence and the afore mentioned collision, the plaintiff, Janelys Camacho suffered serious personal injuries including but not limited to the following:

- a. Chest contusion
- b. mental suffering and anguish

18. As result of the aforesaid injuries, the plaintiff has incurred substantial medical expenses for her treatment of said injuries.

COUNT SEVEN: (Janelys Camacho vs. City of East Haven Pursuant to C.G.S. 52-557n)

1. - 18. Paragraphs 1 through 18 of the Sixth Count are incorporated and made paragraphs 1 through 18 of this Seventh Count as if fully set forth herein.

19. The Defendant, City of East Haven, is liable for damages sustained by the plaintiff, Janelys Camacho pursuant to C.G.S. Section 52-557n(a)(1)(A) for the negligent acts or omissions of its agents and/or employees who were acting within the scope of their employment or official duties.

COUNT EIGHT: (Joelys Rodriguez v. City of East Haven Pursuant to C.G.S. 7-465)

1. - 18. Paragraphs 1 through 18 of the Sixth Count are incorporated and made paragraphs 1 through 18 of this Eighth Count as if fully set forth herein.
19. The defendant, City of East Haven, is liable to pay all sums which it's agents, servants, and/or employees, may be obligated to pay by reason of the liability imposed upon them for damages to the plaintiff, Janelys Camacho, pursuant to the provisions of C.G.S. Section 7-465.
20. Written notice of the intent to file this claim was given to the Clerk of the City of East Haven on March 30, 2017. A copy of the written notice is attached hereto as Exhibit A.

WHEREFORE, the plaintiffs seek:

1. Money damages;
2. Such other relief as warranted in equity and law.

THE PLAINTIFFS,

BY: 403688
JOHN W. MILLS
Mills Law Firm, LLC
One Whitney Avenue
New Haven, CT 06510
Telephone: (203) 776-4500
Facsimile: (203) 773-1811

RETURN DATE: APRIL 2, 2019	:	SUPERIOR COURT
JOELYS RODRIGUEZ, ET AL	:	J.D. OF NEW HAVEN
V.	:	AT NEW HAVEN
MARTEZZ BANKS, ET AL	:	FEBRUARY 22, 2019

STATEMENT OF AMOUNT IN DEMAND

The plaintiff seeks money damages in excess of FIFTEEN THOUSAND
(\$15,000.00) DOLLARS, exclusive of interest and costs.

THE PLAINTIFFS, JOELYS
RORIGUEZ AND JANELYS
CAMACHO

BY: 403688
JOHN W. MILLS
Mills Law Firm, LLC
One Whitney Avenue
New Haven, CT 06510
Telephone: (203) 776-4500
Facsimile: (203) 773-1811

CERTIFICATION

This is to certify that a copy of the foregoing was forwarded via U.S. mail, postage prepaid on February 22, 2019, to:

403688

JOHN W. MILLS

EXHIBIT A

GILLIS & GILLIS

Professional Corporation

WHITNEY GROVE SQUARE
TWO WHITNEY AVENUE, SUITE 502 • NEW HAVEN, CONNECTICUT 06510-1269
TELEPHONE: 203 562-5104 TELEFAX: 203 495-6476
EMAIL: Jeffrey@gillislawfirm.com • WEBSITE: www.Gillislawfirm.com

Attorneys and Counselors at Law

HOWARD T. GILLIS (1935-2002)

JOSEPH L. GILLIS
EDWARD M. GILLIS
JEFFREY S. ARMAS

March 30, 2017

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Town Clerk
Town of East Haven
250 Main Street
East Haven, CT 06512

Re: Claimant: Janelys Camacho ppa Joelys Rodriguez
D/O/A: 3/3/17

To whom it may concern:

Please be advised that this office represents Janelys Camacho, a minor, in her intent to commence an action against The Town of East Haven pursuant to Section 7-465(a) of the Connecticut General Statutes.

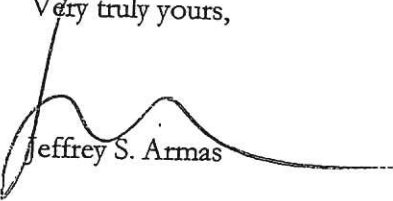
This accident occurred on March 3, 2017 at approximately 7:34 p.m., Joelys Rodriguez was operating a 2017 Toyota Rav4, in which Janelys Camacho rode as a passenger in. Ms. Rodriguez was traveling on the I-91 northbound #5 exit ramp in New Haven, Connecticut. Martez Banks was operating a 1998 Ford F-150. Mr. Banks was traveling on I-91 in a northbound direction while being pursued by the East Haven Police Department. At said date and time, Ms. Rodriguez's vehicle was stopped at the red light on the exit ramp when she was struck in the rear by the vehicle operated by Mr. Banks violently forcing her into another vehicle. The accident occurred as a direct result of Mr. Banks being pursued by the East Haven Police Department.

As a result of this accident, Ms. Camacho sustained injuries to her chest and mental trauma for which she is currently receiving medical treatment.

City Clerk
East Haven Town Clerk
250 Main Street
East Haven, CT 06512
March 30, 2017
Page 2

As stated above, pursuant to Section 7-465(a) of the Connecticut General Statutes, Janely Camacho, through her mother and guardian, Joelys Rodriguez is hereby putting you, as City Clerk, on notice of the injuries sustained by her as a result of the negligent operation of a Town of East Haven motor vehicle operated by a police officer, an employee of the East Haven Police Department. Further, Ms. Camacho is hereby preserving her rights and putting you on notice of her intention to recover damages for these injuries, including medical expenses, disability, pain suffering and other appropriate damages.

Very truly yours,



Jeffrey S. Armas

JSA:sjr

Enclosure (Police Accident Report)

GILLIS & GILLIS

Professional Corporation

WHITNEY GROVE SQUARE
TWO WHITNEY AVENUE, SUITE 502 • NEW HAVEN, CONNECTICUT 06510-1269
TELEPHONE: 203 562-5104 TELEFAX: 203 495-6476
EMAIL: Jeffreya@gillislawfirm.com • WEBSITE: www.Gillislawfirm.com

Attorneys and Counselors at Law

HOWARD T. GILLIS (1935-2002)

JOSEPH L. GILLIS
EDWARD M. GILLIS
JEFFREY S. ARMAS

March 30, 2017

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Town Clerk
Town of East Haven
250 Main Street
East Haven, CT 06512

Re: Claimant: Joelys Rodriguez
D/O/A: 3/3/17

To whom it may concern:

Please be advised that this office represents Joelys Rodriguez in her intent to commence an action against The Town of East Haven pursuant to Section 7-465(a) of the Connecticut General Statutes.

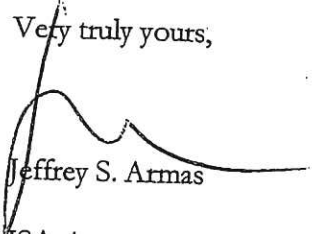
This accident occurred on March 3, 2017 at approximately 7:34 p.m., Joelys Rodriguez was operating a 2017 Toyota Rav4, in which Janelys Camacho rode as a passenger in. Ms. Rodriguez was traveling on the I-91 northbound #5 exit ramp in New Haven, Connecticut. Martezz Banks was operating a 1998 Ford F-150. Mr. Banks was traveling on I-91 in a northbound direction while being pursued by the East Haven Police Department. At said date and time, Ms. Rodriguez's vehicle was stopped at the red light on the exit ramp when she was struck in the rear by the vehicle operated by Mr. Banks violently forcing her into another vehicle. The accident occurred as a direct result of Mr. Banks being pursued by the East Haven Police Department.

As a result of this accident, Ms. Rodriguez sustained injuries to her neck, lower back, left knee and shoulders for which she is currently receiving medical treatment.

City Clerk
East Haven Town Clerk
250 Main Street
East Haven, CT 06512
March 30, 2017
Page 2

As stated above, pursuant to Section 7-465(a) of the Connecticut General Statutes, Joelys Rodriguez is hereby putting you, as City Clerk, on notice of the injuries sustained by her as a result of the negligent operation of a Town of East Haven motor vehicle operated by a police officer, an employee of the East Haven Police Department. Further, Ms. Rodriguez is hereby preserving her rights and putting you on notice of her intention to recover damages for these injuries, including medical expenses, lost wages, disability, pain suffering and other appropriate damages.

Very truly yours,



Jeffrey S. Armas

JSA:sjr

Enclosure (Police Accident Report)

7014 2120 0002 1568 6999

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Postage \$	Postmark Here
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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$ 4.44	
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PS Form 3800, July 2014 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature [Signature] <input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) _____ C. Date of Delivery 4/3/17 D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: _____
1. Article Addressed to: Town Clerk Town of East Haven 250 Main St East Haven, CT 06512	3. Service Type <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™ <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery
2. Article Number (Transfer from service label)	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
7014 2120 0002 1568 6999	
PS Form 3811, July 2013 Domestic Return Receipt	